

ATTN: International Tax Reform Working Group

Dear Representative Nunes and Blumenaur,

I am writing to ask that the International Taxation Committee of the Ways & Means Committee for Tax Reform seriously consider the ACA proposal for reform to Residency-based taxation RBT. See link:

<http://americansabroad.org/files/6513/6370/3681/finalsubrbtmarch2013.pdf>

As one of nearly 7 million American citizens living, working and voting from abroad, and contributing to the economic growth of the U.S. economy, I believe the current Citizenship based taxation regime must be reformed. Current tax policy is negatively affecting this important sector of American and their ability to compete for jobs, grow the US economy through international business and exports, and live overseas. Current tax policy damages both individuals and the welfare of our country.

The following are some examples of the fallout on Americans working overseas from current U.S. Citizenship based taxation:

- Inability to relocate and work internationally
- Denial of job opportunities or job advancement
- Refusal of entry into business partnerships
- Closure or denial of financial instruments (pensions, insurance policies, bank accounts, etc.)
- Exposure to double taxation or increased tax burden
- Financially ruinous penalties due to broad application of criminal tax evasion regulations on those making simple filing errors due to complexity of the US tax code.

I have been personally affected by this situation as I have an Australian partner whom I would like to share a life with, including bank accounts, a home mortgage, and investments. Under current law, he is wary of the implications of having joint accounts and investments as this subjects him, an Australian citizen, to scrutiny by the US government. I will be having children in the future and I worry about the repercussions of my decision to live abroad on them when they begin their working lives. If they choose to live in Australia or elsewhere they will be subject to US tax law even though they would have never been in the US for more than a family vacation. I worry about whether I am in compliance with current tax law, even though I try my best to follow the rules, I cannot afford a US tax attorney here so there is always a measure of doubt weighing on my mind. I love my country and have moved abroad only because I love my partner as well, the current tax law feels like a punishment for being American, something no law abiding patriot should have to feel.

Please seriously consider the RBT proposal submitted by American Citizens Abroad (ACA). A move towards a residence-based system, like the rest of the world, not only would it be simpler and fairer for Americans living abroad, but it would actually bring in MORE tax revenue than the current system, which wastes compliance resources for very little return. RBT would increase United States exports strongly by facilitating American mobility in the global business environment of today's world.

Yours sincerely,

Ashlee Johnson